UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

LIBERTY RESOURCES, INC.; DISABLED IN ACTION OF PENNSYLVANIA, INC; PHILADELPHIA ADAPT; TONY BROOKS; LIAM DOUGHERTY; FRAN FULTON; and LOUIS OLIVO;

Plaintiffs,

-against-

THE CITY OF PHILADELPHIA,

Defendant.

Case No. 2:19-cv-03846

JOINT NOTICE OF MOTION AND MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENT AGREEMENT

Judge: Honorable Harvey Bartle III

Plaintiffs Liberty Resources, Inc., Disabled in Action of Pennsylvania, Inc., Philadelphia ADAPT, Tony Brooks, Liam Dougherty, Fran Fulton, and Louis Olivo; and Defendant City of Philadelphia respectfully move this Honorable Court for an order granting preliminary approval of the attached Settlement Agreement.

This motion is based upon this Notice; the accompanying Memorandum of Law; the declarations filed herewith including all supporting exhibits thereto.

Dated: October 14, 2022

BY: /s/ Meredith J. Weaver

DISABILITY RIGHTS ADVOCATES

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LIBERTY RESOURCES, INC, et al.,

Plaintiffs,

v.

THE CITY OF PHILADELPHIA

Defendant

Case No. 2:19-cv-03846

CERTIFICATE OF SERVICE

I hereby certify that the foregoing JOINT NOTICE OF MOTION AND MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENT AGREEMENT is hereby filed electronically and available for viewing and downloading from the ECF system; and has been served on Defendant's counsel by ECF's electronic notification today, October 14, 2022.

By: /s/ Meredith J. Weaver

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